

**DOCKET SECTION**

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

RECEIVED

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**POSTAL RATE AND FEE CHANGES, 1997 :**

**Docket No. R97-1**

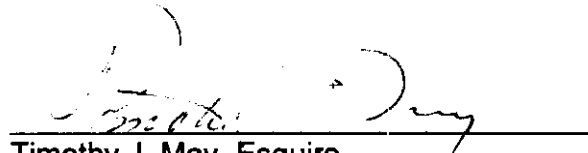
**RESPONSES OF PARCEL SHIPPERS ASSOCIATION (PSA) WITNESS JELLISON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

The Parcel Shippers Association (PSA) hereby provides PSA witness Jellison's responses to the following interrogatories of United States Postal Service:

UPS/PSA-T1-12-19.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,



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Dated: February 6, 1998

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/PSA-T1-12.** Please identify all members of the Parcel Shippers Association.

**RESPONSE.** The membership of the Parcel Shippers Association may be found on the  
PSA Home Page at [www.parcelshippers.org](http://www.parcelshippers.org).

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
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**UPS/PSA-T1-13.**

(a) Do any of the members of the Parcel Shippers Association use CTC? If so, please list how many members of the Association use CTC and the approximate number of parcels shipped through CTC during 1997.

(c) Do any of the members of the Parcel Shippers Association use the services or consolidators or drop-shippers other than CTC? If so, identify all such consolidators or drop-shippers, the number of Association members who use consolidators or drop-shippers other than CTC, and the approximate volume of parcels sent through such consolidators or drop-shippers during 1997.

**RESPONSE.**

(a) I do not know how many members use CTC; however, I do know that some use CTC although I cannot approximate the number of parcels they shipped through CTC during 1997.

(b) Yes. I am unable to identify all such consolidators or drop-shippers; nor do I know the number of Association members who would use them; nor their approximate volume.

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
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**UPS/PSA-T1-14.** On page 3 of your testimony, you state that "Members shipped 124,522,000 Standard (B) Parcel Post by USPS. . . ." Did you mean to use the word "Respondents" rather than the word "Members" in making that statement?

**RESPONSE.** Yes.

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/PSA-T1-15.** On page 4 of your testimony concerning the "OMBC (sic) Discount," you state that of the respondents to the question whether an Association member is currently eligible for the OBMC discount, 17 responded that they were eligible and 10 respondents that they were not eligible, for a total of 27 responses. Please reconcile that total with your indication on the same page that 26 members responded to the question whether they are currently eligible for the OBMC discount.

**RESPONSE.** Please see the errata to page 4 of the testimony of James V. Jellison, filed January 28, 1998.

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/PSA-T1-16.** Please refer to that portion of page 5 of your testimony which indicates that 2 respondents "already use consolidators." Identify the consolidators used by those 2 respondents and the total volume (for both combined) sent by the consolidators used by these two respondents during 1997.

**RESPONSE.** I do not have the permission of the respondents to divulge their identities. Moreover, the survey information does not disclose the volume of parcels that they shipped with consolidators as distinct from shipping directly with the Postal Service or UPS. Their volumes were not excluded from the total volume counts; rather, it was the reported volume of CTC that was excluded on the assumption that it would be a double count of volumes otherwise reported by respondents.

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
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**UPS/PSA-T1-17.** Please refer to the discussion of the DDU discount on page 6 of your testimony. You there indicate that of 30 respondents, 4 currently qualify for the DDU rates, 7 who do not currently qualify would "do the work to become eligible," and 12 "would be willing to use a consolidator," for a total of 23 respondents. Please reconcile this total with your statement that of the 30 respondents, 21 "either currently qualify or would do whatever is necessary, including using a consolidator to qualify."

**RESPONSE.** The confusion in the numbers arises over the fact that of the 12 reported willing to use a consolidator 3 of those also state that they would be willing to do the necessary preparation. Correctly stated the responses should be totaled as follows: of the 30 respondents 4 already qualify; 10 will do nothing to qualify including using a consolidator; of the other 16 respondents, 7 will do the necessary preparation, and of the 19 who would not do the necessary preparation 9 of those would use a consolidator. Thus, out of a total of 30 correspondents, 20, or 2/3rds, either qualify or would do whatever is necessary including using a consolidator in order to qualify. My testimony incorrectly reports that 21 rather than 20 would do so. An errata will be filed to make that correction to page 6 of my testimony.

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
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**UPS/PSA-T1-18.** Please refer to footnote 1 on page 7 of your testimony and the accompanying test.

(a) Is CTC a member of the Parcel Shippers Association, and, if so, did it respond to the survey.

(b) Provide the total amount of "the parcel post volumes reported by CTC" which were excluded from the "current total volume of parcel post shipped by USPS [of] 124,500,000."

(c) On page 5 of your testimony, you indicate that two respondents "already use consolidators." Please provide the volume which those two respondents reported as sending by parcel post.

**RESPONSE.**

(a) Yes. CTC is a member and they did respond to the survey.

(b) CTC has not granted permission to divulge the data it reported in the survey.

(c) I do not have the permission of the respondents to report that information because it could lead to their identification.



**RESPONSES OF PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON  
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**UPS/PSA-T1-19.** Please refer to page 8 of your testimony, where you state that "Not all [of the parcels which are already barcoded] are barcoded with a code that can be read by an OCR. " Please provide your basis for that statement.

**RESPONSE.** Please see my response to USPS/PSA-T1-17.

**DECLARATION**

I, James V. Jellison, declare under penalty of law that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Executed: 2/6/98

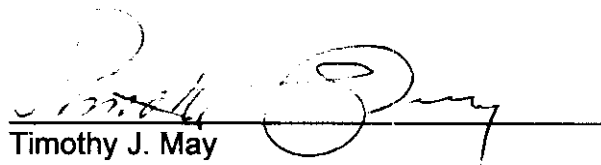
  
James V. Jellison

\*\* TOTAL PAGE.05 \*\*

02/06/98 FRI 09:30 [TX/RX NO 6048]

### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
Timothy J. May

Dated: February 6, 1998